

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CURTIS HERTELL, the Register of Deeds
and Representative of INGHAM COUNTY;
and NANCY HUTCHINS, the Register of Deeds
and Representative of BRANCH COUNTY,
both as Class Representatives of all 83 counties
in the State of Michigan,

Plaintiffs,

v.

Case No. 1:12-cv-00174
HON. ROBERT HOLMES BELL

MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC., MERSCROP, INC., JEANNE KIVI,
ELLEN COON, MARSHALL ISAACS, BANK OF AMERICA, N.C.
JP MORGAN CHASE & CO., CHASE HOME MORTGAGE
CORPORATION f/K/a/CHASE HOME FINANCE, WELLS
FARGO BANK, N.A., CITIMORTGAGE, INC., ETITLE AGENCY,
LLC, FEDERAL NATIONAL MORTGAGE ASSOCIATION,
And JOHN DOE as any Other authorized signer for MERS
or MERSCROP, INC., and Defendants JOHN DOE Corporations I-MMM,

Defendants.

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AFFIDAVIT OF GERALD V. PADILLA

STATE OF MICHIGAN)
)SS
COUNTY OF _____)

GERALD V. PADILLA, being first duly sworn deposes and says:

1. He is co-counsel on the above matter and tried this case to its conclusion along with Daniel V. Padilla.

2. He has been licensed to practice since April 16, 1975, and has been so licensed for the past 37 + years.

3. His practice consists mainly of litigation, and consists of trial work in over fifteen different circuit courts in the State of Michigan, as well as the Court of Claims and Federal jurisdictions in Michigan and Washington, DC.

4. He has tried cases in the Counties of Wayne, Oakland, Macomb, and the Court of Claims, USDC-ED-MI as well as Shiawassee County.

5. He has acted as a plaintiff's arbitrator, defense arbitrator, and a neutral for no fault related claims.

6. He has served as a mediator/facilitator on cases in the circuit courts for this State.

7. He was on the Board of Directors for the Negligence Law Section for the State of Michigan, and is on the board for the Aviation Law Section for the State of Michigan.

8. He is on the Judicial Qualifications Committee.

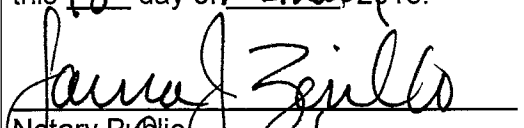
9. He has reviewed the Motion and Brief in this matter, as well as the attorney bills submitted, and the allegations made therein are true to the best of his knowledge and belief.

FURTHER, DEPONENT SAYETH NOT.



GERALD V. PADILLA

Subscribed and sworn to before me
this 18th day of February, 2013.



Notary Public
County of Cook, State of Michigan
Acting in the County of _____
My Commission Expires: 8-10-2013